

The Australian Council of State School Organisations (ACSSO) is the one voice for every child in public education in Australia. Our organisation has in its membership the peak organisations from state and territories across Australia and boasts a data base of in excess of 14,000 people. We have significant following in social media. We have an active interest in family engagement in a child's education journey commencing at birth.

We are extremely pleased to make comment on the Productivity Commission's recommendations and offer the following for consideration. We see the inquiry as an opportunity to reshape Australia's prior to school services so they offer access to high quality education and care at a cost that is affordable to all families, and available to all children.

ACSSO believes that this report has considerable focus on the participation of workforce and less on the needs of the child. We see prior to school settings as an investment in young children.

It is ACSSO's position that a child's early years lay the foundation for all that is to come. In recent years, researchers have learnt that the human brain develops the vast majority of its neurons, and is at its most receptive to learning, between birth and three years of age. Research has clearly identified that in these early years the intake of new information is critical to the formation of active neural pathways.

Education begins from the moment the child is brought home from the hospital and continues on when the child starts to attend playgroups and kindergartens. The learning capabilities of humans continue for the rest of their lives but not at the intensity that is demonstrated in the preschool years. With this in mind, babies and toddlers need positive early learning experiences to help their intellectual, social and emotional development and this lays the foundation for later school success.

Firstly, can we state that we are extremely supportive of Draft Recommendation 12.9:

The Australian Government should continue to provide per child payments to the states and territories for universal access to a preschool program of 15 hours per week for 40 weeks per year. This support should be based on the number of children enrolled in state and territory government funded preschool services, including where these are delivered in a long day care service.

The Australian Government should negotiate with the state and territory governments to incorporate their funding for preschool into the funding for schools, and encourage extension of school services to include preschool.

As an organisation we believe that it is essential that all children should have the opportunity to access quality affordable prior to school services. Both formal and informal early childhood education plays a vital role in child development; assisting in identifying of the need for early intervention, preparing schools for the child's intake into kindergarten /reception, allowing opportunity for parents to work and /or study.

Due to the importance of these vital years universal access should be extended to young children from the age of three.

There should be flexibility in opportunity however for the hours offered. Many country areas have limited access to prior to school services and even mobile services can be at great distances away for some families; so again, access is limited

ACSSO policy is clear:

Free preschool education should be available to all children twelve months prior to the commencement of school.¹

DRAFT RECOMMENDATION 6.1

The Fair Work Ombudsman, and employer and employee associations should trial innovative approaches to:

- ***increase awareness about the 'right to request flexible work arrangements' and individual flexibility arrangements under the Fair Work Act 2009 and National Employment Standards***
- ***promote positive attitudes among employers, employees and the wider community towards parents, particularly fathers, taking up flexible work and other family-friendly arrangements***

This recommendation goes a small way to address ACSSO's concern with regard to the varied hours that parents work. However, it does not examine the extended hours of any child care provider to support the shift working parent who has no alternative of childcare for their child / children.

ACSSO rejects the following recommendation:

DRAFT RECOMMENDATION 7.2

Requirements for educators in centre-based services should be amended by governments such that:

- ***all educators working with children aged birth to 36 months are only required to hold at least a certificate III, or equivalent***
- ***the number of children for which an early childhood teacher must be employed is assessed on the basis of the number of children in a service aged over 36 months.***

It is well-researched and documented that quality learning and conversation in the first three years are vital for growth and brain development. The first three years of life are a period of incredible growth in all areas of a baby's development. Research by neuroscientists on human development is clear that the architecture of the brain needs specific attention during these crucial years.² We do have major concerns, particularly relating to children under three years, in the name of cutting costs

Speech development is one of the first tools that a child will demonstrate in their lifelong education. Wordlessly at first, infants and toddlers begin to recognise familiar objects and to formulate the laws that systematically govern their properties. With encouragement through books and interaction, most toddlers soon pick up vocabulary.

As a caregiver in centre-based services, it is really useful to understand how language unfolds. The first words that toddlers learn are normally the names of familiar people and objects around them. Then they learn words that stand for actions. Only then do they start to have the words that describe their world, that are about ideas. This development is usually in the second part of the second year of life. A parent or caregiver can have a vast impact on a child's speech development by the amount of time that is spent talking with and reading to a child.

¹ Australian Council of State School Organisations Policy: Early Childhood

² Understanding the Brain: the birth of a learning science (OECD, 2007)

From Neurons to Neighbourhoods: the science of early childhood development (Shonkoff & Phillips, 2000)

Every caregiver can, in culturally appropriate ways, help infants and toddlers grow in language and literacy. Caregivers need presence, time, words, print, and intention to share language and literacy with infants and toddlers. All five qualities are important but it is intention that can turn a physical act like putting away toys or lining up at preschool into a delightful learning experience. Even a trip to the grocery store can be turned into a vocabulary lesson about colours and the names of fruits.

Lowering the qualifications requirements for educators in centre-based services is not acceptable; these young children require and deserve quality programming and care to ensure the optimum growth and development during these vital years. This goes against clear evidence that a child's cognitive, social-emotional, language development and pre-academic skills are all heavily shaped by their earliest interactions and experiences from infancy.³ Highly qualified and skilled staff is one of the most important requirements for parents when choosing a centre.

DRAFT RECOMMENDATION 7.4

Governments should develop and incorporate into the National Quality Framework a nationally consistent set of staff ratios and qualifications for those caring for school age children in outside school hours and vacation care services. These requirements should take into consideration ratios that are currently acceptable for children during school hours, the uncertainty surrounding the additional benefits of more staff and higher qualifications, and the valuable contribution that can be made to outside school hours care services by less qualified older workers and university/TAFE students.

ACSSO believes that there should be a consistency of ratios across the nation; this is currently not the case. A suggested consideration of 1:12 would be appropriate.

We firmly consider that staff require professional qualifications and that this be a minimum certificate 3.

OSHC staff should have a link with the school staff and communicate regularly to ensure the well-being of the children. Issues of concern can be relayed and suggested strategies can make the child's attendance at the service a more effective one.

DRAFT RECOMMENDATION 7.5

To provide services with greater flexibility to meet staffing requirements, ACECQA should:

- ***remove the requirement that persons with early childhood teacher qualifications must have practical experience for children aged birth to twenty four months***
- ***explore ways to make the requirements for approving international qualifications simpler and less prescriptive in order to reduce obstacles to attracting appropriately qualified educators from overseas.***

All governments should allow services to temporarily operate with staffing levels below required ratios, such as by maintaining staffing levels on average (over a day or week), rather than at all times.

³ Li, W., Farkas, G., Duncan, G., Burchinal, M. R., & Vandell, D. (2013). Timing of high quality child care and cognitive, language and preacademic development. *Developmental Psychology*, 49 (8) 1440---1451

The New South Wales and South Australian Governments should allow a three month probationary hiring period in which unqualified staff may be included in staff ratios before beginning a qualification, as was recently adopted in all other jurisdictions.

As parents we strongly assert that no matter their child's age, those educating and caring for our children should have the best skills and qualifications to do so.

We would not accept a teacher in a primary school working without approved teaching qualifications and being registered in the appropriate jurisdiction, parents value their children's early learning education in the same way.

This also goes for pre-service training; we reject the notion that early childhood teachers need not be required to have 0-2 year old practical experience. A crucial time in a child's development would require leadership in the centre in all age groups from the early childhood teacher.

The child-to-educator ratios legislated through the National Quality Framework are critical to regulating the safety and quality of any childcare system. This must be maintained at ALL times.

Implicit in the rolling back of ratio requirements would be the risk management and safety for all concerned.

ACSSO applauds NSW and SA for maintaining the requirement for unqualified staff to reach their three month probationary period before being included in the staff ratio. Children's safety and the quality of their care are a parent's first and foremost concern.

If implemented a large number of families will no longer be able to access quality early learning for their children. Some will be forced to reduce participation in the workforce or leave altogether.

DRAFT RECOMMENDATION 12.2

The Australian Government should combine the current Child Care Rebate, Child Care Benefit and the Jobs Education and Training Child Care Fee Assistance funding streams to support a single child-based subsidy, to be known as the Early Care and Learning Subsidy (ECLS). ECLS would be available for children attending all mainstream approved ECEC services, whether they are centre-based or home-based.

DRAFT RECOMMENDATION 12.4

The Australian Government should fund the Early Care and Learning Subsidy to assist families with the cost of approved centre-based care and home-based care. The program should:

- assist with the cost of ECEC services that satisfy requirements of the National Quality Framework***
- provide a means tested subsidy rate between 90 per cent and 30 per cent of the deemed cost of care for hours of care for which the provider charges***
- determine annually the hourly deemed cost of care (initially using a cost model, moving to a benchmark price within three years) that allows for differences in the cost of supply by age of child and type of care***
- support up to 100 hours of care per fortnight for children of families that meet an activity test of 24 hours of work, study or training per fortnight, or are explicitly exempt from the criteria***

- ***pay the assessed subsidy directly to the service provider of the parents' choice on receipt of the record of care provided.***

We are very concerned with the recommendation to limit or stop support for children with parents who do not pass the work or study test. It is extremely concerning that children could then be denied the chance to participate in a quality early learning program because of their parent's work circumstances.

Parents who work from home should be able to gain access to support – this would include parents who work on family farms.

Whilst we understand there is an emphasis to increase the participation of parents in the workforce and thus an increase in productivity we are deeply concerned that the *Inquiry lacks a focus on the quality of the service and instead refers to cost cutting measures.*

CUTS TO THE CHILDCARE REBATE

We are deeply concerned at the draft recommendation to reduce the childcare rebate for some Australian families. We could not support the recommendation to cut the rebate from 50% for families with household incomes over \$160,000. We feel that this should remain equal for all Australian families with additional support provided to those families who need it.

Cuts to the rebate affect the equality of women in the home and in the workplace. Their decision to go back to work is heavily influenced by how much of their wage will be used for childcare fees.

The recommendation to cut the Child Care Rebate and remove access to the 50% subsidy capped at \$7,500 for all families will have far reaching negative consequences.

Women wishing to continue to pursue their careers in professional roles like teaching, nursing and in business will be particularly affected by the recommended cut to the rebate. We understand that most women have their children in child care for a minimum of three days a week. These women will be hit the hardest by the recommended changes as they are unlikely to have ever reached the \$7500 cap and are therefore receiving a full 50% rebate.

DRAFT RECOMMENDATION 7.10

State and territory governments should, as a matter of priority, harmonise background checks for ECEC staff and volunteers by either:

- ***advancing a nationally consistent approach to jurisdiction-based 'working with children checks' as proposed in the National Framework for Protecting Australia's Children, including mutual recognition of these checks between jurisdictions, or***
- ***implementing a single, nationally recognised 'working with children check'.***

A "working with children check" must be a prerequisite for anyone in child-related work.

ACSSO totally supports the introduction of a single, nationally recognised "working with children check". This check should be universal and utilised by all other groups – religious, sporting, local government, health, education, charitable organisations.

ACSSO also believes that if the outcome of a “working with children check” is a clearance, the cleared individual must still be subject to ongoing monitoring for relevant new records for the life of the clearance.

INFORMATION REQUEST 8.3

This comments on services being able to utilise places when children are on extended leave – currently when children have long absences when either hospitalised or on a family holiday the family is still expected to pay, we accept this. If the child’s place was filled during that time could a reduction in fees be considered for the absent child?

IN CONCLUSION

The Australian Council of State School Organisations is pleased to see the support of Universal Access for the year prior to school, this needs to be flexible and accessible to all; we would further recommend that it be extended to the two years prior to school. The 15 hours should not be rigid but individualised to the context – particularly when rural and remote and mobile pre-schools are considered.

We commend the Commission’s recommendations to improve access to early learning and care services for a range of families that find it difficult to get their child into the education system they need – this includes Aboriginal and Torres Strait Islander children, children in low socio-economic circumstances, those with a disability and those in regional and remote areas.

However we will never support any recommendation that reduces the quality of the education and care available to ALL children of all ages; that makes it harder for families to afford or access care; or that forces working parents to reduce hours or leave the workforce altogether.

ACSSO does not accept the notion that the reduction in quality of education and service provided for children should be a cost cutting measure. Early childhood education is an investment in the development of a child, to which every family should have the opportunity to access at an affordable cost.